

1 MAYER BROWN LLP
LEE H. RUBIN (SBN 141331)
lrubin@mayerbrown.com
2 EDWARD D. JOHNSON (SBN 189475)
wjohnson@mayerbrown.com
3 DONALD M. FALK (SBN 150256)
dfalk@mayerbrown.com
4 ERIC B. EVANS (SBN 232476)
eevans@mayerbrown.com
5 Two Palo Alto Square, Suite 300
3000 El Camino Real
6 Palo Alto, CA 94306-2112
Telephone: (650) 331-2000
7 Facsimile: (650) 331-2061

8 *Attorneys for Defendant*
9 *Google Inc.*

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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN JOSE DIVISION**

14 IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

15 THIS DOCUMENT RELATES TO:
16 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF ERIC B. EVANS IN
SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL PORTIONS OF
GOOGLE'S RESPONSE TO
PLAINTIFFS' SUPPLEMENT
REGARDING MOTION TO COMPEL
GOOGLE DOCUMENTS AND EXHIBIT
A TO THE DECLARATION OF ERIC B.
EVANS IN SUPPORT THEREOF**

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22 I, Eric B. Evans, declare as follows:

23 1. I am a partner with the law firm of Mayer Brown LLP, counsel for Defendant
24 Google, Inc. ("Google") in the above-captioned matter. I am admitted to practice law before
25 this Court. I submit this declaration in support of Google's Administrative Motion to Seal
26 Portions of Google's Response to Plaintiffs' Supplement Regarding Motion to Compel Google
27 Documents and Exhibit A to the Declaration of Eric B. Evans in Support Thereof that is being
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1 filed concurrently herewith. As an attorney involved in the defense of this action, unless
2 otherwise stated, I have personal knowledge of the facts stated in this declaration and if called as
3 a witness, I could and would competently testify to them.

4 2. I have read and reviewed the Declaration of Laszlo Bock filed on January 25,
5 2013 (Dkt. 319-3), which describes the competitive harm that Google would suffer if
6 information in the Declaration of William Campbell were made public. Specifically, Mr. Bock
7 testified that were this information made public Google's competitors would discover and
8 therefore better understand, the unique and confidential arrangement between Mr. Campbell and
9 Google regarding his role as senior advisor to Google, including how this arrangement was
10 formalized and documented and the details and express terms and conditions of that
11 arrangement (such as the specific manner in which Mr. Campbell has been, and continues to be,
12 compensated for his work as a senior advisor to Google).

13 3. I have also read and reviewed Google's Response to Plaintiffs' Supplement
14 Regarding Motion to Compel Google Documents and Exhibit A to the Declaration of Eric B.
15 Evans in Support Thereof (transcript excerpts from the deposition of William Campbell). The
16 proposed redactions to Google's Response to Plaintiffs' Supplement Regarding Motion to
17 Compel Google Documents, and Exhibit A to the Declaration of Eric B. Evans in Support
18 Thereof, discuss or reflect information contained in the Declaration of William Campbell.

19 4. Accordingly, and for the reasons articulated in the Declaration of Laszlo Bock,
20 these excerpts contain highly confidential information, and Google would suffer competitive
21 harm if such excerpts were made public.

22 I declare under penalty of perjury that the foregoing is true and correct. Executed on
23 February 18, 2013 in Palo Alto, California.

24
25 s/ Eric B. Evans

26 Eric B. Evans
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